

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

PROMEGA CORPORATION,

Plaintiff,

and

MAX-PLANCK-GESELLSCHAFT zur  
FORDERUNG der WISSENSCHAFTEN E.V.,

Case No. 10-cv-281-bbc

Involuntary Plaintiff,

v.

LIFE TECHNOLOGIES CORPORATION,  
INVITROGEN IP HOLDINGS, INC., and  
APPLIED BIOSYSTEMS, LLC,

Defendants.

**DEFENDANTS' RESPONSE TO PROMEGA CORPORATION'S PROPOSED  
ADDITIONAL VOIR DIRE QUESTIONS**

Defendants Life Technologies Corporation, Applied Biosystems, LLC, and Invitrogen IP Holdings, Inc., (collectively, "Life"), by and through counsel, respectfully submit this Response to Plaintiff Promega Corporation's Proposed Additional Voir Dire Questions (Dkt. #391).

Life objects to Promega's proposed Question No. 5, which seeks to ask the potential jurors if they have "any negative views about Stem Cell Research." This question is vague, and not relevant to the issues in this case.

Life similarly objects to Promega's proposed Question No. 13, which asks "Did you or any member of your family attend or graduate from the University of Wisconsin, Madison," which is not relevant to issues in the case.

As to Questions 4, 9 and 14, Life requests that, if the Court is inclined to ask these questions, it ask the same questions with respect to Life (*i.e.*, “Do you know anyone who works for Promega?” “Do you know anyone who works for Life Technologies or Applied Biosystems?”, etc.

DATED: January 25, 2012.

By: /s/ Kristine E. Johnson

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